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PRIVILEGED & CONFIDENTIAL

July 31, 2023

Ad Hoc Committee of Talc Claimants

In re LTL Management, No 21-30589
United States Bankruptcy Court for the District of New Jersey

Invoice Period: 04-04-2023 - 04-14-2023

RE: LTL Management Bankruptcy II

Time Details

Date	Professional	Task	Hours	Rate	Amount
04-04-2023	RSM	B110 - Case Administration	0.10	860.00	86.00
		Reviewed FCR's submission re dismissal order.			
04-04-2023	RSM	B110 - Case Administration	1.30	860.00	1,118.00
		Analyzed strategic issues re LTL's new Court filings.			
04-04-2023	RSM	B110 - Case Administration	0.70	860.00	602.00
		Correspondence with co-counsel and committee member representatives re LTL's new Court filings.			
04-05-2023	RSM	B110 - Case Administration	0.40	860.00	344.00
		Correspondence with clients and co-counsel re strategies for dealing with LTL's new filings.			
04-05-2023	RSM	B110 - Case Administration	0.50	860.00	430.00
		Zoom conference with co-counsel re next steps for LTL II bankruptcy.			
04-05-2023	RSM	B110 - Case Administration	1.50	860.00	1,290.00
		Zoom conference with clients and co-counsel re next steps and strategies for LTL II bankruptcy.			
04-05-2023	RSM	B110 - Case Administration	0.40	860.00	344.00
		Reviewed analysis of new LTL filings and potential arguments in opposition.			
04-05-2023	CMW	B410 - General Bankruptcy Advice / Opinions	2.00	500.00	1,000.00
		Analyzed case law on the ability to seek mandamus of a bankruptcy court directly at the circuit court level.			
04-05-2023	JSM	B110 - Case Administration	0.80	1,160.00	928.00
		Reviewing new bankruptcy petition filed by LTL.			
04-05-2023	JSM	B110 - Case Administration	2.10	1,160.00	2,436.00
		Reviewing John Kim first-day declaration.			
04-05-2023	JSM	B110 - Case Administration	1.90	1,160.00	2,204.00
		Reviewing motion for stay relief filed by LTL.			
04-05-2023	JSM	B110 - Case Administration	0.40	1,160.00	464.00
		Email communication with counsel to Ad Hoc committee regarding legal strategy.			
04-05-2023	JSM	B110 - Case Administration	1.00	1,160.00	1,160.00
		Zoom with representatives on Ad Hoc committee to discuss legal strategy.			
04-05-2023	JSM	B110 - Case Administration	0.50	1,160.00	580.00
		Zoom with counsel to Ad Hoc committee to discuss legal strategy.			
04-05-2023	JSM	B110 - Case Administration	0.60	1,160.00	696.00
		Revising legal strategy outline for Ad Hoc committee.			
04-05-2023	RA	B110 - Case Administration	0.40	320.00	128.00

Date	Professional	Task	Exhibit B-4	Page 3 of 11	Hours	Rate	Amount
		Execute docket searches for prior relevant cases.					
04-06-2023	KB	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.40	500.00	200.00
		Review bankruptcy petition plus first-day filings.					
04-06-2023	AS	B140 - Relief from Stay / Adequate Protection Proceedings			2.00	595.00	1,190.00
		Review LTL filing in advance of strategy meeting.					
04-06-2023	JSM	B110 - Case Administration			0.50	1,160.00	580.00
		Revising legal strategy outline for Ad Hoc committee.					
04-06-2023	JSM	B110 - Case Administration			1.00	1,160.00	1,160.00
		Zoom with representatives on Ad Hoc committee to discuss legal strategy.					
04-06-2023	JSM	B110 - Case Administration			0.30	1,160.00	348.00
		Email communication with Gerard Cicero of Brown Rudnick to discuss legal strategy.					
04-06-2023	JSM	B110 - Case Administration			0.30	1,160.00	348.00
		Email communication with Mike Winograd of Brown Rudnick to discuss legal strategy.					
04-06-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			4.60	1,160.00	5,336.00
		Drafting legal arguments to oppose LTL motion for stay relief.					
04-06-2023	RSM	B110 - Case Administration			0.10	860.00	86.00
		Correspondence with clients and co-counsel re LTL's proposed settlement.					
04-06-2023	JSM	B110 - Case Administration			0.30	1,160.00	348.00
		Email communication with counsel to Ad Hoc committee regarding legal strategy.					
04-06-2023	KB	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.10	500.00	50.00
		Correspond with J. Massey regarding upcoming research regarding the motion to dismiss.					
04-07-2023	JSM	B110 - Case Administration			0.40	1,160.00	464.00
		Email communication with counsel to Ad Hoc committee regarding legal strategy.					
04-07-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.60	1,160.00	696.00
		Zoom with counsel to Ad Hoc committee to discuss motion to dismiss.					
04-07-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			5.20	1,160.00	6,032.00
		Drafting Ad Hoc committee motion to dismiss.					
04-07-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			3.90	1,160.00	4,524.00
		Drafting opposition to LTL motion for stay relief.					
04-07-2023	AS	B140 - Relief from Stay / Adequate Protection Proceedings			0.60	595.00	357.00
		Call with Brown Rudnick and Otterbourg re MTD and PI.					
04-07-2023	AS	B140 - Relief from Stay / Adequate Protection Proceedings			0.10	595.00	59.50
		Teleconference with J. Massey re follow-up to call with Brown Rudnick and Otterbourg re MTD and PI.					
04-07-2023	AS	B140 - Relief from Stay / Adequate Protection Proceedings			2.30	595.00	1,368.50
		Legal research re mandate rule.					
04-07-2023	AS	B140 - Relief from Stay / Adequate Protection Proceedings			0.10	595.00	59.50
		Email R. Morse and K. Bjorklund re case status and strategy.					
04-07-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	860.00	172.00
		Correspondence with colleagues re potential legal arguments in support of motion to dismiss.					
04-08-2023	JSM	B110 - Case Administration			0.60	1,160.00	696.00
		Review draft information brief.					
04-08-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			4.90	1,160.00	5,684.00

Date	Professional	Task	Exhibit B-4	Page 4 of 11	Hours	Rate	Amount
		Drafting Ad Hoc committee motion to dismiss.					
04-08-2023	RSM	B110 - Case Administration			0.20	860.00	172.00
		Reviewed client comments on draft AHC statement.					
04-08-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	860.00	172.00
		Analyzed outline of arguments for motion to dismiss.					
04-08-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	860.00	172.00
		Reviewed K. Bjorklund research re debtor's pre-filing duties to maximize value.					
04-08-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.10	860.00	86.00
		Correspondence with K. Bjorklund re further research avenues re debtor's pre-filing duties to maximize value.					
04-08-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.10	860.00	86.00
		Correspondence with J. Massey re potential factual arguments related to frustration of purpose					
04-08-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	860.00	172.00
		Reviewed legal analysis of LTL's frustration of purpose argument.					
04-08-2023	JSM	B110 - Case Administration			0.30	1,160.00	348.00
		Email communication with counsel to Ad Hoc committee regarding legal strategy.					
04-08-2023	KB	B190 - Other Contested Matters (excluding assumption / rejection motions)			3.20	500.00	1,600.00
		Research whether fraudulent transfers may be unwound or nullified and whether declining to pursue fraudulent transfer litigation constitutes a failure of a debtor's duty to maximize the value of the bankruptcy estate.					
04-09-2023	JSM	B110 - Case Administration			0.40	1,160.00	464.00
		Email communication with counsel to Ad Hoc committee regarding legal strategy.					
04-09-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			7.30	1,160.00	8,468.00
		Drafting Ad Hoc committee motion to dismiss.					
04-09-2023	JSM	B110 - Case Administration			0.40	1,160.00	464.00
		Review draft information brief.					
04-09-2023	JSM	B195 - Non-Working Travel			3.20	580.00	1,856.00
		Travel to Trenton for first-day hearing. [BILLED AT 50% OF RATE]					
04-09-2023	AS	B140 - Relief from Stay / Adequate Protection Proceedings			0.20	595.00	119.00
		Review draft motion to dismiss.					
04-10-2023	JSM	B110 - Case Administration			0.30	1,160.00	348.00
		Review draft information brief.					
04-10-2023	JSM	B110 - Case Administration			0.30	1,160.00	348.00
		Review PHV motion for new bankruptcy case.					
04-10-2023	JSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			2.80	1,160.00	3,248.00
		Revising draft motion to dismiss second LTL bankruptcy petition.					
04-10-2023	RA	B110 - Case Administration			0.80	320.00	256.00
		Draft Pro Hac Vice applications for J. Massey and R. Morse.					
04-10-2023	JSM	B110 - Case Administration			1.00	1,160.00	1,160.00
		Zoom with representatives on Ad Hoc committee to discuss legal strategy.					
04-10-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			4.70	1,160.00	5,452.00
		Drafting legal arguments to oppose LTL motion for stay relief.					
04-10-2023	JSM	B110 - Case Administration			0.40	1,160.00	464.00
		Email communication with counsel to Ad Hoc committee regarding legal strategy.					
04-10-2023	RSM	B110 - Case Administration			0.80	860.00	688.00
		Participated in Zoom with clients and co-counsel re motion to dismiss, informational brief, and upcoming first day hearing.					

Date	Professional	Task	Exhibit B-4	Page 5 of 11	Hours	Rate	Amount
04-10-2023	RSM	B110 - Case Administration			0.10	860.00	86.00
		Reviewed LTL's filing in response to MRHFM objection.					
04-10-2023	RSM	B110 - Case Administration			0.10	860.00	86.00
		Reviewed draft Omnibus Objection to Debtor's First Day Relief.					
04-10-2023	RSM	B110 - Case Administration			0.10	860.00	86.00
		Reviewed Kazan McClain opposition to Debtor's motion for order authorizing filing list of top law firms.					
04-10-2023	RSM	B110 - Case Administration			0.60	860.00	516.00
		Reviewed draft informational brief of the ad hoc Committee re LTL second bankruptcy filing.					
04-10-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.30	860.00	258.00
		Correspondence with J. Massey re avenues for gathering factual support for motion to dismiss.					
04-10-2023	RSM	B110 - Case Administration			0.20	860.00	172.00
		Revised motion for admission pro hac vice.					
04-10-2023	RSM	B110 - Case Administration			0.20	860.00	172.00
		Correspondence with local counsel re motions for admission pro hac vice.					
04-10-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.30	860.00	258.00
		Correspondence with J. Massey re preliminary injunction opposition.					
04-11-2023	RSM	B110 - Case Administration			2.40	860.00	2,064.00
		Attended remotely portions of first day hearing of new LTL bankruptcy.					
04-11-2023	JSM	B110 - Case Administration			7.40	1,160.00	8,584.00
		Attend first-day hearing in LTL 2.0.					
04-11-2023	JSM	B195 - Non-Working Travel			4.50	580.00	2,610.00
		Travel for first-day hearing in LTL 2.0. [BILLED AT 50% OF RATE]					
04-11-2023	JSM	B110 - Case Administration			0.60	1,160.00	696.00
		Email communication with Ad Hoc counsel regarding legal strategy.					
04-12-2023	JSM	B110 - Case Administration			0.60	1,160.00	696.00
		Email communication with Ad Hoc counsel regarding legal strategy.					
04-12-2023	JSM	B140 - Relief from Stay / Adequate Protection Proceedings			5.30	1,160.00	6,148.00
		Revising preliminary injunction stay relief opposition brief.					
04-12-2023	JSM	B110 - Case Administration			0.50	1,160.00	580.00
		Further email communication with Ad Hoc counsel regarding legal strategy.					
04-12-2023	JGM	B180 - Avoidance Action Analysis			0.20	800.00	160.00
		Communicate with R. Morse re avoidance action research.					
04-12-2023	JGM	B180 - Avoidance Action Analysis			5.80	800.00	4,640.00
		Legal research re avoiding fraudulent transfers or unwinding mergers in bankruptcy.					
04-12-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.40	860.00	344.00
		Correspondence with colleagues re legal research re responding to Debtor's argument re solvency.					
04-12-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.70	860.00	602.00
		Analyzed legal arguments for unwinding funding agreement surrender.					
04-12-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.20	860.00	172.00
		Conference with J. Mallory re legal research and analysis re responding to Debtor's argument re surrender of funding agreement.					
04-12-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.90	860.00	774.00
		Conference with co-counsel re strategy for motion to dismiss and injunctive relief motion.					
04-12-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings			0.30	860.00	258.00
		Correspondence with co-counsel re meet and confer re discovery negotiations.					
04-12-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)			0.40	860.00	344.00

Date	Professional	Task	Exhibit B-4	Page 6 of 11	Hours	Rate	Amount
04-12-2023	RSM	Correspondence with clients re potential arguments and strategies for motion to dismiss. B140 - Relief from Stay / Adequate Protection Proceedings			0.80	860.00	688.00
04-13-2023	RSM	Participated in Zoom with clients and co-counsel re discovery strategy and plan. B140 - Relief from Stay / Adequate Protection Proceedings			0.40	860.00	344.00
04-13-2023	RSM	Correspondence with colleagues re work on preliminary injunction opposition brief. B140 - Relief from Stay / Adequate Protection Proceedings			0.80	860.00	688.00
04-13-2023	RSM	Zoom conference with clients and co-counsel re discovery disputes and strategies. B110 - Case Administration			0.10	860.00	86.00
04-13-2023	RSM	Reviewed M. Watts video message re J&J settlement plan. B110 - Case Administration			0.30	860.00	258.00
04-13-2023	RSM	Communication with clients and co-counsel re issues re LTL proposed plan and settlement. B140 - Relief from Stay / Adequate Protection Proceedings			0.30	860.00	258.00
04-13-2023	RSM	Revised draft opposition to preliminary injunction motion. B140 - Relief from Stay / Adequate Protection Proceedings			0.30	860.00	258.00
04-13-2023	MC	Analyzed legal and factual arguments in support of preliminary injunction opposition brief. B190 - Other Contested Matters (excluding assumption / rejection motions)			1.40	1,000.00	1,400.00
04-13-2023	JGM	Review draft of objection to motion to apply automatic stay to non-debtors and for preliminary injunction and provide comments to Jonathan Massey. B190 - Other Contested Matters (excluding assumption / rejection motions)			4.30	800.00	3,440.00
04-13-2023	JGM	Revise draft preliminary injunction opposition. B190 - Other Contested Matters (excluding assumption / rejection motions)			0.40	800.00	320.00
04-13-2023	JSM	Communicate with team re insolvency and financial distress. B110 - Case Administration			0.50	1,160.00	580.00
04-13-2023	JSM	Further email communication with Ad Hoc counsel regarding legal strategy. B140 - Relief from Stay / Adequate Protection Proceedings			3.60	1,160.00	4,176.00
04-13-2023	JSM	Revising draft motion to dismiss. B140 - Relief from Stay / Adequate Protection Proceedings			5.20	1,160.00	6,032.00
04-13-2023	JSM	Revising preliminary injunction stay relief opposition brief. B140 - Relief from Stay / Adequate Protection Proceedings			0.90	1,160.00	1,044.00
04-13-2023	JSM	Zoom with outside counsel to Ad Hoc committee to discuss discovery strategy. B140 - Relief from Stay / Adequate Protection Proceedings			0.70	1,160.00	812.00
04-13-2023	JSM	Reviewing fraudulent conveyance research to include in preliminary injunction opposition. B110 - Case Administration			0.60	1,160.00	696.00
04-14-2023	JSM	Email communication with Ad Hoc counsel regarding legal strategy. B110 - Case Administration			0.60	1,160.00	696.00
04-14-2023	JSM	Email communication with Ad Hoc counsel regarding legal strategy. B140 - Relief from Stay / Adequate Protection Proceedings			3.40	1,160.00	3,944.00
04-14-2023	JSM	Revising preliminary injunction opposition. B140 - Relief from Stay / Adequate Protection Proceedings			3.20	1,160.00	3,712.00
04-14-2023	JSM	Revising draft motion to dismiss. B110 - Case Administration			0.80	1,160.00	928.00
		Litigation strategy zoom with Ad Hoc committee.					

Date	Professional	Task	Hours	Rate	Amount
04-14-2023	JSM	B110 - Case Administration	0.50	1,160.00	580.00
		Further email communication with Ad Hoc counsel regarding legal strategy.			
04-14-2023	JGM	B190 - Other Contested Matters (excluding assumption / rejection motions)	2.60	800.00	2,080.00
		Revise draft preliminary injunction opposition.			
04-14-2023	JGM	B190 - Other Contested Matters (excluding assumption / rejection motions)	3.30	800.00	2,640.00
		Review new documents from LTL.			
04-14-2023	RA	B110 - Case Administration	0.60	320.00	192.00
		Review documentation received from co-counsel.			
04-14-2023	MC	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.20	1,000.00	1,200.00
		Review documents in debtor's production.			
04-14-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings	0.50	860.00	430.00
		Zoom conference with clients and co-counsel re Debtor's proposed agreement re preliminary injunction scope.			
04-14-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings	1.60	860.00	1,376.00
		Revised draft opposition brief re preliminary injunction relief.			
04-14-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings	0.80	860.00	688.00
		Confer with colleagues re analyzing facts to support motion to dismiss and opposition to preliminary injunction relief.			
04-14-2023	RSM	B190 - Other Contested Matters (excluding assumption / rejection motions)	1.20	860.00	1,032.00
		Analyzed Debtor's documents for purposes of developing factual support for motion to dismiss.			
04-14-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings	2.70	860.00	2,322.00
		Attended portion of Haas deposition for purposes of developing factual record for opposition to preliminary injunction relief.			
04-14-2023	RSM	B110 - Case Administration	0.50	860.00	430.00
		Attended Court conference re protective order issues.			
04-14-2023	RSM	B140 - Relief from Stay / Adequate Protection Proceedings	2.80	860.00	2,408.00
		Attended portion of Kim deposition for purposes of developing factual record for opposition to preliminary injunction relief.			
Total					145,755.50

Time Summary

Professional	Hours	Amount
Anne Swift	5.30	3,153.50
Christopher Walling	2.00	1,000.00
Jeremy Mallory	16.60	13,280.00
Jonathan Massey	89.90	99,818.00
Kate Bjorklund	3.70	1,850.00
Matthew Collette	2.60	2,600.00
Rachel Morse	27.30	23,478.00
Rob Aguirre	1.80	576.00
Total		145,755.50

Expenses

Expense	Description	Amount
E110 - Out of town travel	JSM - Two nights of lodging in Princeton for 4/11 hearing in Trenton.	369.10
E110 - Out of town travel	JSM - Rental car and parking to attend 4/11 hearing in Trenton.	102.46

Total Expenses	471.56
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Total for this Invoice	146,227.06
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Task Summary

Massey & Gail LLP

Include Matter Details = False
Include Matter and Professional Details = False
Professional = All (Active Only)
Group By Professional Group
Task = All
View = Original
From 04-04-2023 To 04-14-2023

Professional Summary

Task	Time (Hours)	Amount	Average Rate	% Total Time
Aguirre, Rob				
B110 - Case Administration	1.800	576.00	320.00	100.00%
Professional Total	1.800	576.00		
Bjorklund, Kate				
B190 - Other Contested Matters (excluding assumption / rejection motions)	3.700	1,850.00	500.00	100.00%
Professional Total	3.700	1,850.00		
Collette, Matthew				
B190 - Other Contested Matters (excluding assumption / rejection motions)	2.600	2,600.00	1,000.00	100.00%
Professional Total	2.600	2,600.00		
Mallory, Jeremy				
B180 - Avoidance Action Analysis	6.000	4,800.00	800.00	36.14%
B190 - Other Contested Matters (excluding assumption / rejection motions)	10.600	8,480.00	800.00	63.86%
Professional Total	16.600	13,280.00		
Massey, Jonathan				
B110 - Case Administration	25.900	30,044.00	1,160.00	28.81%
B140 - Relief from Stay / Adequate Protection Proceedings	35.500	41,180.00	1,160.00	39.49%
B190 - Other Contested Matters (excluding assumption / rejection motions)	20.800	24,128.00	1,160.00	23.14%
B195 - Non-Working Travel	7.700	4,466.00	580.00	8.57%
Professional Total	89.900	99,818.00		
Morse, Rachel				
B110 - Case Administration	10.600	9,116.00	860.00	38.83%
B140 - Relief from Stay / Adequate Protection Proceedings	11.600	9,976.00	860.00	42.49%
B190 - Other Contested Matters (excluding assumption / rejection motions)	5.100	4,386.00	860.00	18.68%
Professional Total	27.300	23,478.00		
Swift, Anne				
B140 - Relief from Stay / Adequate Protection Proceedings	5.300	3,153.50	595.00	100.00%
Professional Total	5.300	3,153.50		

Task Summary

Massey & Gail LLP

Include Matter Details = False
Include Matter and Professional Details = False
Professional = All (Active Only)
Group By Professional Group
Task = All
View = Original
From 04-04-2023 To 04-14-2023

Task	Time (Hours)	Amount	Average Rate	% Total Time
Walling, Christopher				
B410 - General Bankruptcy Advice / Opinions	2.000	1,000.00	500.00	100.00%
Professional Total	2.000	1,000.00		

Task Summary

Massey & Gail LLP

Include Matter Details = False
Include Matter and Professional Details = False
Professional = All (Active Only)
Group By Professional Group
Task = All
View = Original
From 04-04-2023 To 04-14-2023

Summary Totals

Task	Time (Hours)	Amount
B110 - Case Administration	38.300	39,736.00
B140 - Relief from Stay / Adequate Protection Proceedings	52.400	54,309.50
B180 - Avoidance Action Analysis	6.000	4,800.00
B190 - Other Contested Matters (excluding assumption / rejection motions)	42.800	41,444.00
B195 - Non-Working Travel	7.700	4,466.00
B410 - General Bankruptcy Advice / Opinions	2.000	1,000.00
Grand Total	149.200	145,755.50